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Attorneys for Defendant,
Martha Kongsgaard individually and as Trustee of the
Martha Kongsgaard GST Exempt Trust U/T/A
Dated October 21, 1993

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FRANCIS WANG, individually and as Trustee
of WFT-TNG, a California Trust,

Plaintiff,

v.

MARTHA KONGSGAARD, individually and
as Trustee of The Martha Kongsgaard GST
Exempt Trust U/T/A dated October 21, 1993,

Defendant.

Case No. 3:19-cv-00907 EDL

**STIPULATED REQUEST FOR ORDER
CHANGING TIME FOR HEARING ON
DEFENDANT'S MOTION TO DISMISS OR
IN THE ALTERNATIVE FOR STAY OF
PROCEEDINGS AND FOR
CONTINUANCE OF CASE
MANAGEMENT CONFERENCE.**

(Civil Local Rules 6-1(b), 7-12)

**Current Hearing Date: June 25, 2019
Time: 9:00 a.m.
Courtroom E, 15th floor
Magistrate Judge Elizabeth D. Laporte**

WHEREAS Francis Wang, individually and as Trustee of WFT-TNG, a California Trust
("Plaintiff") and Martha Kongsgaard, individually and as Trustee of The Martha Kongsgaard
GST Exempt Trust U/T/A dated October 21, 1983 ("Defendant"), through their counsel of
record, file this Stipulated Request for Order Changing Time for Hearing on Defendant's Motion
to Dismiss or, in the alternative, Stay Proceedings and in support state as follows:

1 1. The parties respectfully request that this Court hear Defendant's Motion to
2 Dismiss or, in the alternative, Stay Proceedings on **May 14, 2019**. The parties request that
3 Plaintiff's Opposition be filed on May 3, 2019, and that Defendant's Reply be filed on May 8,
4 2019;

5 2. The Parties further respectfully request that this Court continue the Case
6 Management Conference currently set for May 14, 2019, to **June 25, 2019** and that all related
7 deadlines be tied to the new hearing date; and

8 3. The Parties further state that neither party will be prejudiced by this extension.
9

10 WHEREFORE, Plaintiff and Defendant hereby stipulate as follows: (1) Defendant's
11 Motion to Dismiss or, in the alternative, Stay Proceedings hearing proceed on May 14, 2019; (2)
12 Plaintiff's opposition be filed on May 3, 2019; (3) Defendant's reply be filed on May 8, 2019;
13 and (4) the Case Management Conference be continued to June 25, 2019, and that all related
14 deadlines be tied to the new hearing date.

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16 IT IS SO STIPULATED.

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18 Dated: April 25, 2019

PHILLIPS SPALLAS & ANGSTADT LLP

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20 By: /s/Bradley Jameson
21 Bradley Jameson

22 Attorney for Plaintiff,
23 Francis Wang individually and as Trustee of WFT-
24 TNG, a California Trust
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1 Dated: April 26, 2019

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3 By: /s/Timothy M. Flaherty

4 Timothy M. Flaherty
5 Melissa M. Palozola

6 Attorneys for Defendant,
7 Martha Kongsgaard individually and as Trustee of the
8 Martha Kongsgaard GST Exempt Trust U/T/A
9 Dated October 21, 1993

10 PURSUANT TO STIPULATION, IT IS SO ORDERED.

11 Dated: April 26, 2019

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13 Elizabeth D. Laporte
14 Magistrate Judge of the United States District Court
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